

manatt

SO ORDERED:



HON. VERNON S. BRODERICK
UNITED STATES DISTRICT JUDGE

March 18, 2024

VIA ECF

Honorable Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Because a court determining whether to grant a stay of discovery pending a motion to dismiss must consider, among other factors, "the breadth of discovery sought, the burden of responding to it, . . . and the strength of the pending motion forming the basis of the request for stay," *Republic of Turkey v. Christie's, Inc.*, 316 F. Supp. 3d 675, 677 (S.D.N.Y. 2018) (internal quotation marks omitted), the parties shall submit a revised letter, ten days after the motion to dismiss is fully briefed, addressing why the above-referenced factors weigh in favor of staying discovery in this case.

Dated: March 19, 2024

Re: ***Ventura v. H&M Hennes & Mauritz L.P.*, No. 1:23-cv-02115-VSB (S.D.N.Y.)**
Consented Request to Stay Discovery

Dear Judge Broderick:

We represent Defendant H&M Hennes & Mauritz, L.P. in the above-referenced action. We write pursuant to Rule 1.G of Your Honor's Individual Rules and Practices in Civil Cases to respectfully request a stay in discovery pending resolution of a dispositive motion.

Pursuant to the Case Management Plan entered May 19, 2023, class certification discovery is set to close on March 31, 2024. (ECF No. 10.) On March 8, 2024, Defendant moved for dismissal. (ECF No. 19.) Plaintiff Victoria Ventura has consented to a stay in discovery pending resolution of the motion to dismiss. Following the Court's ruling on the motion, the parties will, if necessary, meet and confer to agree upon a revised case management plan. No prior request has been made by Defendant.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Matthew F. Bruno

Matthew F. Bruno

cc: Counsel of Record (via ECF)